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January 19, 2010

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's
Intervention in Numbering Resources Determinations -
Charleston Rate Center
Docket No.

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Charleston Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of these documents on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml
Attachment
772093

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

| | | |
|--------------------------------------|---|------------------------|
| In Re: AT&T SOUTH CAROLINA'S |) | |
| PETITION REQUESTING THE COMMISSION'S |) | DOCKET NO. 2010-____-C |
| INTERVENTION IN NUMBERING RESOURCES |) | |
| DETERMINATIONS |) | |
| _____ |) | |

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE CHARLESTON RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T South Carolina”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging numbering determinations, petitions the Public Service Commission of South Carolina (“Commission”) for review of a recent denial of AT&T South Carolina’s application for use of numbering resources in the 843 area code. Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”), depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “Central office code administration,”¹ and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of

¹ See, e.g., 47 C.F.R. §52.15.

NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer SAIC.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides certain services that are regulated by the Commission. Among other things, it provides intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Charleston exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”).³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“*Third NRO Order*”).

³ See 47 C.F.R. § 52.13 (a), (b).

⁴ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 (“Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.”).

center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about December 18, 2009, AT&T South Carolina submitted a Pooling Administration System request for the assignment of one thousands-block in the Charleston exchange that does not conflict with its customer's existing dialing plan. In order to meet the customer's express request for numbers,⁹ AT&T South Carolina requested the assignment of the

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

⁶ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁷ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

843-714-6XXX one thousands-block.¹⁰ As AT&T South Carolina does not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that these numbers be assigned to it.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Charleston Rate Center had a MTE of 43.481 months for the relevant block, and a utilization of 64.533%.¹¹

10. Thereafter, also on December 18, 2009, AT&T South Carolina's request was denied because AT&T South Carolina had not met the rate center based MTE criterion now set forth in the INC Guidelines.¹² AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Charleston Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving

¹⁰ See Exhibit B to this Petition.

¹¹ See *Id.*

¹² See *Id.*

telecommunications services of their choice from providers of their choice for want of numbering resources.”¹³

12. Both the FCC’s rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁴

13. Prior to the FCC’s Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider’s inventory did not have a block of sequential numbers large enough to meet the customer’s specific request. Under today’s procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.”¹⁵ In addition, the FCC has ruled that, “States...may grant requests for customers seeking contiguous block of numbers.”¹⁶

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with

¹³ *Second NRO Order* at ¶ 61.

¹⁴ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) (“The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission”); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) (“Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body”).

¹⁵ *Third NRO Order* at ¶ 64.

¹⁶ *Id.*

AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide AT&T South Carolina the 843-714-6XXX one thousands-block in the Charleston exchange; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 19th day of January, 2010.



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

Attachment A



09/30/09

Attention AT&T:

We are requesting 200 range of number because of our national dialing plan restrictions. We are looking for numbers in the 843 XXX-6760 up to 6960. We currently have prefixes 573, 740, 746, 974 and were trying to stay in that range.

Our current numbers are
8435732934 to 8435732993
8437407361 to 8437407420
8437407720 to 8437407759
8437467200 to 8437467239
8439746008 to 8439746008
8439746700 to 8439746712
8439746714 to 8439746759

We need DIDs that will not conflict with our current dial plan. This is for our location at
3950 Faber Pl
Ste 200
N Charleston, SC 29405












We also need 360 to 400 consecutive DID stations for our N Rhett facility. The address is
5617 NORTH RHETT AVE.
NORTH CHARLESTON, SOUTH CAROLINA 29406.

We are looking for numbers in the 843 NXX - 6XXX range, if possible. Can you tell me what you have available? Also, can you tell me what the costs would be, both monthly and installation? We would be pointing these to our PRIs 90.IPZX.510953.001 - 003.

Thank you for your consideration and assistance.

Lois Elo
Billing/ Contracts Manager
IT Telecommunications
858-826-6408
elol@saic.com

Attachment B

| Pooling Administration System | |
|---|--|
|  rena.wilkie@att.com (SP) |  Sign Out |
| Time : 12/18/2009 05:49:34 PM EST | |
|  Individual Block Requests  CO/NXX Code Requests  Withdraw Pending Requests  Confirm Resources In Service  Donate Blocks  Submit Forecast  Search Forms  Reports  User Profile | <div>Printable Version TBPAG Attachment 1 - March 19, 2007</div> <div>Thousands-Block Application Form - Part 1A</div> <div>Tracking Number: 843-CHARLESTON-SC-332175 Individual Block Request</div> <div>Type of Application: <input checked="" type="radio"/> New <input type="radio"/> Change <input type="radio"/> Disconnect</div> <div>GENERAL APPLICATION INFORMATION</div> <div>1.1 Contact Information:</div> <div>Block Applicant: Company Name: BELLSOUTH SO BELL Headquarters Address: 500 Broad St SE City, State, Zip: Gainesville, GA, 30501 Contact Name: Rena Buttica Contact Address: 500 Broad St SE City, State, Zip: Gainesville, GA, 30501 Phone: 770-945-9630 FAX: 770-945-9630 E-mail: rw0052@att.com</div> <div>Pooling Administrator: ⁱⁱ Contact Name: Dora Wirth Contact Address: 1800 Sutter St City, State, Zip: Concord, CA, 94520 Phone: 925-363-8706 FAX: 925-363-7684 E-mail: dora.wirth@neustar.com</div> <div>1.2 General Information:</div> <div>Check one : No LRN needed <input type="radio"/> LRN needed <input checked="" type="radio"/> ⁱⁱⁱ</div> <div>NPA: 843 LATA: 436 OCN: ^{iv} 9417 Parent Company's OCN: 9400</div> <div>Number of Thousands-Blocks Requested : 1</div> |

Switching Identification(Switch Entity/POI) : ^v
CHTNSCNO74F

City or Wire Center Name : Rate Center: ^{vi}
CHARLESTON
Rate Center Sub Zone:

1.3 Dates:

Date of Application: ^{vii} Requested Block Effective Date: ^{viii}
12/18/2009 01/18/2010

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes ☐ No ☒

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : **Incumbent Local Exchange Carrier (ILEC)**
(LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : **Wireline**
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional)
REQUEST 843-714-6
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
ALL EXCEPT ABOVE
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool)

1.5 Type of Request:

Initial block for rate center : Yes ☐ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.
Growth block for rate center : Yes ☒ If Yes , attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark **all** that apply)

OCN:Intra-company ^{ix} Switching Id Part 1B

OCN:Inter-company ^x Effective Date

Change block : Yes ☐ If Yes , list NPA-NXX-X

1.6 Block Return :

- a) Is this block Contaminated Yes ☐ No ☐
- b) If Yes how many TNs are NOT available for assignment :
- c) Have all new Intra SP ports been completed in the NPAC Yes ☐ No ☐
- d) Has this block been protected from further assignment Yes ☐ No ☐

Disconnect block : Yes If Yes , list NPA-NXX-X

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

Rena Buttica

**Associate
Technical
Support
Analyst** **12/18/2009**

Signature of Block Applicant

Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name,

and providing their title and date.

Foot Notes :

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

[Back](#)

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TBPAG Att 1 - March 19, 2007
ATIS-0300066.at1

NPAC BLOCK HOLDER DATA
Submit one form per thousands-block request.

| | |
|--|--|
| Activation Request: <u> X </u> | Intra SP Block Porting Request: <u> </u> |
| or | |
| Modification Request: <u> </u> | For Information Only: <u> </u> |

If request is for Activation, the thousands-block applicant is to provide all data except Block Range, Block Effective Date and LERG Assignee/donating switch information; the PA will fill in those three fields. For a Modification or Intra SP Block Porting Request, the requestor is to provide all information.

Block Applicant to provide this data **ONLY if NPAC Activate Block Range is marked "YES."** For Intra SP Block Porting the Block Holder should reflect the routing information of the switch the block is being transferred to6.

| | | | | | |
|-------------------|-----|---|-----|---|-----|
| Class DPC7 | 252 | - | 74 | - | 150 |
| Class SSN8 | 000 | | | | |
| LIDB DPC9 | 243 | - | 252 | - | 253 |
| LIDB SSN10 | 000 | | | | |
| CNAM DPC11 | 243 | - | 252 | - | 5 |
| CNAM SSN12 | 000 | | | | |
| ISVM DPC13 | 252 | - | 47 | - | 150 |
| ISVM SSN14 | 000 | | | | |
| WSMSC DPC15 | N/A | | | | |
| WSMSC SSN16 | N/A | | | | |
| SOA Origination17 | N/A | | | | |

Section C:**To be filled out by the SP for Intra SP Block Porting.**

To be completed if using 3.0 or higher.

New LRN: _____

Do you want the BCD record updated? YES _____ NO _____

Section D:

NPAC is to Activate/Modify/Port the Block (1K), as indicated on this form. When the Block (1K) Activation / Modification / Port is complete and the data in this section inserted, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.

Block (1K) Request Complete

YES _____ NO _____

Complete Date (MM/DD/YYYY)

_____/_____/_____

Complete Time (HH/MM)

_____:____/____/_____

NPAC Personnel performing change

_____/_____/_____

Block Holder sent Completed Form:

YES _____ NO _____

Complete Date (MM/DD/YYYY)

_____/_____/_____

Mailed Time (HH/MM)

_____:____/____/_____

Contact Name

_____/_____/_____

Pooling Administrator sent Completed Form:

YES _____ NO _____

Complete Date (MM/DD/YYYY)

_____/_____/_____

Mailed Time (HH/MM)

_____:____/____/_____

Contact Name

_____/_____/_____

Remarks:

Notes:

- 1) The requesting Block Applicant shall complete this form except for Block Range and Block Effective Date, when submitting PART 1 of the INC Thousands-Block Applicant form to the Pooling Administrator. A separate Part 1B form is to be completed for each 1K Block Range requested.

- 2) The Pooling Administrator will insert Block Range and Block Effective Date information, then submit this form to the regional NPAC at the same time PART 3 of the INC Thousands-Block Applicant form is returned to the requesting Block Applicant.

- 3) Pre-Block Activation:

If the Block Holder is requesting a modification, the Block Holder needs to complete Sections A and any applicable data in Section B of this form and send it to the Pooling Administrator (PA). The PA will forward the a) form to the NPAC for processing.

- 4) Post- Block Activation: If Block Holder requests NPAC to perform the Block Modification, then Sections A & B of this form should be completed and send to the Pooling Administrator. The Pooling Administrator will send the information on to the NPAC. Upon completion of this request, NPAC sends a copy of the completed form to the Pooling Administrator and Block Holder.

Foot Notes:

The Service Provider ID of the block holder. The SPID must be a valid SPID in the NPAC system. If your company does not have a SPID, please call the NPAC at 1-888-NPAC-HEL(P) for assistance.

2 A Location Routing Number is a 10-digit number, in the format NPA-NXX-XXXX, that uniquely identifies a switch or point of interconnection (POI). The NPA-NXX portion of the LRN is used to route calls to numbers that have been ported.

3 The Pooling Administrator will insert Block information. The Block will consist of NPA-NXX and the first digit of the 1K block.

4 The Pooling Administrator will insert Block Effective Date. See section 9.2.4 of the Thousands-Block (NXX-X) Number Pooling Administration Guidelines for specifics on effective date. This is the earliest date that the NPAC will broadcast the Block information to all Local SMSs.

5 If "YES" is marked the NPAC will activate the block range. If "NO" is marked it will be the responsibility of the SP to activate the block range.

6 NANC 191

Whenever a DPC value is specified, an SSN value likewise must be provided (and vice versa).

The three-digit values used for the first three-digit portion of the DPC must be between 001 and 255 and the three-digit values used for the next two three-digit portions of the DPC must be between 000 and 255.

NANC 291

The SSN value must be 000; no other value is accepted.

7 Customer Local Area Signaling Services Destination Point Code for 10-digit GTT for CLASS features for the 1K block.

8 Customer Local Area Signaling Services Subsystem Number for the 1K block.

9 Line Information Database Destination Point Code for 10-digit GTT for LIDB features for the 1K block.

10 Line information Database Subsystem Number for the 1K block.

11 Calling Name Delivery Destination Point Code for 10-digit GTT for CNAM features for the 1K block.

12 Calling Name Delivery Subsystem Number for the 1K block.

13 Inter-Switch Voice Mail Destination Point Code for 10-digit GTT for ISVM features for the 1K Block

14 Inter-Switch Voice Mail Services Subsystem Number for the 1K block. .

15 Wireless Short Message Service Center Destination Point Code for 10-digit GTT for WSMSC features. This field is only required if the service provider supports WSMSC data.

16 Wireless Short Message Service Center Subsystem Number for the 1K block. This field is only required if the service provider supports WSMSC data.

17 The SOA Origination Field must be populated with "No" if the NPAC Activate Block Range is marked "Yes" which specifies that the block applicant will not activate their own block range.

| Pooling Administration System | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|----------|----------|----------|----------|----------|----------|----------|----------|-----------|-----------|-----------|--|----------|----------|----------|----------|----------|----------|----------|----------|----------|-----------|-----------|-----------|--|------|-------|------|-----|------|------|--|--|--|--|--|--|---|------|------|------|------|------|------|------|------|------|------|------|------|
| rena.wilkie@att.com (SP) | Sign Out | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Time : 12/18/2009 05:49:55 PM EST | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Individual Block Requests <input type="checkbox"/> CO/NXX Code Requests <input type="checkbox"/> Withdraw Pending Requests <input type="checkbox"/> Confirm Resources In Service <input type="checkbox"/> Donate Blocks <input type="checkbox"/> Submit Forecast <input type="checkbox"/> Search Forms <input type="checkbox"/> Reports <input type="checkbox"/> User Profile </div> <div> Appendix 3 MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹ (Thousands-Block Number Pooling Growth Block Request) </div> <div style="text-align: right;"> Printable Version May 16, 2008 </div> </div> | <p>Tracking Number: 843-CHARLESTON-SC-332175</p> <p>Date: 12/18/2009 OCN: 9417 Company Name: BELLSOUTH SO BELL</p> <p>Rate Center: CHARLESTON</p> <p>List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):</p> <p>Name of Block Applicant: Rena Buttica Signature: Rena Buttica</p> <p>Title: Associate Technical Support Analyst Telephone No.: 770-945-9630</p> <p>FAX No.: 770-945-9630</p> <p>E-mail: rw0052@att.com</p> <p>A. Available Numbers: 137646</p> <p>B. Assigned Numbers: 316627</p> <p>C. Total Numbering Resources: 490641</p> <p>D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: 0</p> <p>List Excluded Code(s) or Block(s):</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Month #1</th> <th>Month #2</th> <th>Month #3</th> <th>Month #4</th> <th>Month #5</th> <th>Month #6</th> <th>Month #7</th> <th>Month #8</th> <th>Month #9</th> <th>Month #10</th> <th>Month #11</th> <th>Month #12</th> </tr> </thead> <tbody> <tr> <td>E. Growth History - Previous 6 months³</td> <td>1728</td> <td>10908</td> <td>1572</td> <td>930</td> <td>1010</td> <td>1845</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>F. Forecast - Next 12 months⁴</td> <td>2999</td> <td>3999</td> <td>2999</td> <td>2999</td> <td>2999</td> <td>2999</td> <td>2999</td> <td>2999</td> <td>2999</td> <td>2999</td> <td>2999</td> <td>2999</td> </tr> </tbody> </table> <p>G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): 3165.667</p> | | | | | | | | | | | | | Month #1 | Month #2 | Month #3 | Month #4 | Month #5 | Month #6 | Month #7 | Month #8 | Month #9 | Month #10 | Month #11 | Month #12 | E. Growth History - Previous 6 months ³ | 1728 | 10908 | 1572 | 930 | 1010 | 1845 | | | | | | | F. Forecast - Next 12 months ⁴ | 2999 | 3999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 |
| | Month #1 | Month #2 | Month #3 | Month #4 | Month #5 | Month #6 | Month #7 | Month #8 | Month #9 | Month #10 | Month #11 | Month #12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| E. Growth History - Previous 6 months ³ | 1728 | 10908 | 1572 | 930 | 1010 | 1845 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| F. Forecast - Next 12 months ⁴ | 2999 | 3999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | 2999 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

H. Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested
1

Available Numbers
137646

Months To Exhaust
43.481

I.
Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= **64.533**

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation:

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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Dated 18 December 2009

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : **843-
CHARLESTON-
SC-332175**

Date of Application: **12/18/2009** Effective Date: _____

Date of Receipt: **12/18/2009** Date of Response: **12/18/2009**

Service Provider Name: **BELLSOUTH SO BELL**

(Telcordia TM LERG TM
Routing Guide) OCN: **9417**

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dora Wirth Phone: **925-363-8706**

Signature of Pooling Administrator
Dora Wirth Fax: **925-363-7684**

Name (print)

Email: **dora.wirth@neustar.com**

NPA-NXX or
NPA-NXX-X : _____

Block Assigned: _____

Block Reserved _____

Block
Reservation
Expiration Date : _____

Block/Code
Modified : _____

Block/Code
Disconnected : _____

Block Contaminated(Yes or No) :

If Yes,enter the number of TNs contaminated :

Switch Identification(Switch Entity/POI): ¹

CHTNSCNO74F

Rate Center:

CHARLESTON

Rate Center Sub Zone:

X Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.




















Explanation:

Assignment activity suspended by the administrator.

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

| Pooling Administration System | |
|---|--|
|  rena.wilkie@att.com (SP) | • Sign Out |
| Time : 12/18/2009 05:42:56 PM EST | |
| <div> Individual Block Requests</div> <div> CO/NXX Code Requests</div> <div> Withdraw Pending Requests</div> <div> Confirm Resources In Service</div> <div> Donate Blocks</div> <div> Submit Forecast</div> <div> Search Forms</div> <div> Reports</div> <div> User Profile</div> | <h3>Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹</h3> <p>Your Utilization calculates to 64.533%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months.</p> <p>Select One Option and Submit</p> <p><input checked="" type="radio"/> Return to the Months To Exhaust Form</p> <p><input type="radio"/> Need to request a State Waiver</p> <p><input type="radio"/> Received a State Waiver</p> <p><input type="button" value="Submit"/> <input type="button" value="Cancel"/></p> |
| <p>Question? Email us © 1997-2012 NeuStar, Inc. Legal Notice</p> | |

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused AT&T South Carolina’s Petition for Review of Numbering Resources Determination in the Charleston Rate Center to be served by the method indicated below upon the following this January 19, 2010:

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Sr. NPA Relief Planner – Eastern Region NANPA
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Longwood, FL 32779-2327
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NeuStar-NANPA
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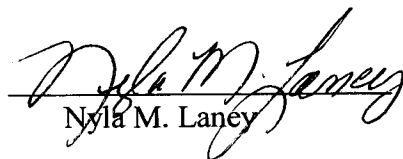
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Nyla M. Laney